

AFFIDAVIT OF MARK BOORSE

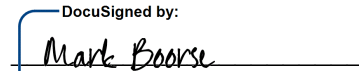
1. I am an adult over the age of eighteen (18) and legally competent to testify.
2. I am the Director of Program Development at Access Services and have been working for Access Services since approximately 1982.
3. Access Services is a non-profit organization that, among other things, provides services to unhoused residents in Southeastern Pennsylvania, including unhoused residents of the Borough of Pottstown, PA.
4. As part of my responsibilities at Access Services, I conduct outreach at homeless encampments in the Borough of Pottstown, including the encampment located on Borough of Pottstown-owned land next to the Schuylkill River Trail along College Drive, Pottstown, PA (the “College Drive Encampment”).
5. Based on my experience visiting the College Drive Encampment and other homeless encampments in the Borough of Pottstown, I estimate that there are approximately twenty-five (25) unhoused residents at the College Drive Encampment and approximately seventy-five (75) to ninety-five (95) unhoused residents in the Borough of Pottstown in total.
6. As part of my outreach responsibilities, I distribute food and coordinate a “Street Medicine” program that delivers medical care to Borough of Pottstown unhoused residents, including the residents of the College Drive Encampment.
7. On average, I visit the College Drive Encampment approximately twice per week.
8. When I conduct outreach at Borough of Pottstown and other Montgomery County homeless encampments, I try to help connect residents to shelter.
9. However, there is no shelter option available right now or in the foreseeable future to most of the College Drive Encampment residents.

10. In 2022, the Coordinated Homeless Outreach Center in Norristown, which was the only year-end homeless shelter for single adults in Montgomery County, closed.
11. The primary shelter option for single, unhoused adults in Montgomery County is hotel rooms provided by Montgomery County. However, the waitlist for this program is approximately three to six months long, depending on the resident's level of vulnerability.
12. In or around August 2023, residents of the College Drive Encampment told me that the Pottstown Police Department told them they would need to move. Later, the Borough of Pottstown, via the Pottstown Police Department, confirmed to me that it would be closing the College Drive Encampment and that all of the unhoused residents at the encampment would need to relocate.
13. The Pottstown PD further informed me that it would be warning unhoused residents that they may be arrested for trespass if they stay at the College Drive Encampment after its closure.
14. On September 28, 2023, Officer Guth of the Pottstown Police Department informed me, as well as Mr. Alfredo Beltran and Ms. Danika Ruyak, that the Borough of Pottstown would be closing the College Drive Encampment in or around November or December 2023.
15. Officer Guth stated that the reason that the Borough of Pottstown would be closing the College Drive Encampment was to clear trees from Borough of Pottstown-owned land along the Schuylkill River Trail and to plant grass instead.

16. Officer Guth made no offer of alternative housing to Mr. Beltran and Ms. Ruyak, instead encouraging them to relocate to other outdoor spaces owned by entities other than the Borough of Pottstown.
17. At a meeting on or around October 2, 2023, the Borough of Pottstown informed me, as well as a representative of Beacon of Hope, another non-profit serving unhoused Borough of Pottstown residents, that it would close the College Drive Encampment in or around December 2023.
18. During the October 2, 2023 meeting, representatives of the Borough of Pottstown requested that Access Services and Beacon of Hope help the College Drive Encampment residents to find alternative housing.
19. I and the representative of Beacon of Hope explained to the Borough of Pottstown representatives that it would be impossible for our organizations to help the College Drive Encampment residents find shelter housing because there is not adequate shelter space available.
20. The Borough of Pottstown indicated that it would go forward with the sweep anyway.
21. If the Borough of Pottstown closes the College Drive Encampment on or around December 1, 2023, I believe most of the residents at the College Drive Encampment will have no choice but to relocate to other outdoor spaces.
22. Over the last two years, the Borough of Pottstown has conducted sweeps of other homeless encampments in the Borough of Pottstown.
23. These sweeps have endangered unhoused residents by pushing them into less safe locations and disrupting continuity of medical care through the Street Medicine program.

24. In addition, if the College Drive Encampment is closed, Access Services and the Street Medicine program will need to find where the College Drive Encampment residents went to continue to provide life-sustaining services.

I declare under the penalty of perjury that the above is true and correct to the best of my knowledge, information, and belief.

DocuSigned by:

Mark Boorse

10/30/2023

Date